UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA,

No. 98 CR 407-2

v.

Judge Charles R. Norgle, Jr.

MIGUEL TORRES

GOVERNMENT'S MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT'S MOTION FOR COMPASSIONATE RELEASE

The UNITED STATES OF AMERICA, by its attorney, JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, hereby moves for an extension of time, to and including June 30, 2022, to respond to defendant MIGUEL TORRES' motion for compassionate release (ECF No. 450), and in support thereof, the government states the following:

- 1. In October 1997, defendant MIGUEL TORRES and his co-defendants were convicted of various charges stemming from the co-defendants' roles in kidnapping four victims, one of whom was a 17-year-old boy who was shot and killed. ECF No. 271; *United States v. Torres*, 191 F.3d 799, 803 (7th Cir. 1999). The Court sentenced defendant to multiple life sentences. ECF No. 303.
- 2. Defendant has filed a *pro se* motion for compassionate release, and the Court ordered the government to respond by May 5, 2022. ECF No. 452.
- 3. The undersigned government counsel recently learned of the defendant's motion and entered an appearance on behalf of the United States. The undersigned government counsel respectfully requests an extension of time, to and

including June 30, 2022, to receive and review pertinent case files and the defendant's medical records from the Bureau of Prisons, and to prepare a response to defendant's motion.

WHEREFORE the United States respectfully moves for an extension of time, to and including June 30, 2022, to respond to defendant MIGUEL TORRES' motion for compassionate release.

Respectfully submitted,

JOHN R. LAUSCH, JR. United States Attorney

By: /s/ John D. Mitchell
JOHN D. MITCHELL
Assistant U.S. Attorney
219 South Dearborn, Fifth Floor
Chicago, Illinois 60604
(312) 353-5300